

ATTACHMENT I-1

(Plaintiff's Proposed Special Verdict Form)

Answer the questions below in the order they are presented.

A. LIABILITY.

1. Do you find for Plaintiff against Defendant Latasha Kebe, Defendant Kebe Studios LLC, or both, on Plaintiff's DEFAMATION claim? (Check one for each Defendant.)

As to Defendant Latasha Kebe:

Yes _____ No _____
(liable) (not liable)

As to Defendant Kebe Studios LLC:

Yes _____ No _____
(liable) (not liable)

2. Do you find for Plaintiff against Defendant Latasha Kebe, Defendant Kebe Studios LLC, or both, on Plaintiff's INVASION OF PRIVACY - FALSE LIGHT claim? (Check one for each Defendant.)

As to Defendant Latasha Kebe:

Yes _____ No _____
(liable) (not liable)

As to Defendant Kebe Studios LLC:

Yes _____ No _____
(liable) (not liable)

3. Do you find for Plaintiff against Defendant Latasha Kebe, Defendant Kebe Studios LLC, or both, on Plaintiff's INTENTIONAL INFLICTION OF EMOTIONAL DISTRIESS claim? (Check one for each Defendant.)

As to Defendant Latasha Kebe:

Yes _____ No _____
(liable) (not liable)

As to Defendant Kebe Studios LLC:

Yes _____ No _____
(liable) (not liable)

B. DAMAGES.

4. Please set forth the amount of damages, if any, that Plaintiffs have proven by a preponderance of the evidence in each of the following categories:

Pain and Suffering	\$ _____
Medical Expenses	\$ _____
Other Damages for Defamatory Statements	\$ _____
Total	\$ _____

5. Do you find Defendant Latasha Kebe and Defendant Kebe Studios LLC jointly and severally liable for the damages awarded to Plaintiff?

Yes _____ No _____

6. If the answer to Question 5 is “Yes,” skip this question. If the answer to Question 5 is “No,” please assign to each Defendant the percentage of fault, if any, you attribute to causing Plaintiff’s damages. (The total must equal 100%.)

Defendant Latasha Kebe: _____ %

Defendant Kebe Studios LLC: _____ %

C. LEGAL FEES AND EXPENSES / PUNITIVE DAMAGES.

7. Concerning a possible award of attorneys' fees and expenses (the amount of which will be determined at a later time), please answer the following additional question:

a. Do you find that Defendant Latasha Kebe, Defendant Kebe Studios LLC, or both, have acted in bad faith, have been stubbornly litigious, or have caused Plaintiff unnecessary trouble and expense? (Check one for each Defendant.)

As to Defendant Latasha Kebe:

Yes _____ No _____

As to Defendant Kebe Studios LLC:

Yes _____ No _____

8. Concerning a possible award of punitive damages (the amount of which will be determined at a later time), please answer the following additional questions:

a. Do you find that Plaintiff has proven by clear and convincing evidence that Defendant Latasha Kebe, Defendant Kebe Studios LLC, or both, are guilty of willful misconduct, malice, fraud, wantonness, oppression, or entire want of care? (Check one for each Defendant.)

As to Defendant Latasha Kebe:

Yes _____ No _____

As to Defendant Kebe Studios LLC:

Yes _____ No _____

b. Do you find that Plaintiff has proven by clear and convincing evidence that Defendant Latasha Kebe, Defendant Kebe Studios LLC, or both, acted with specific intent to cause harm to Plaintiff? (Check one for each Defendant.)

As to Defendant Latasha Kebe:

Yes _____ No _____

As to Defendant Kebe Studios LLC:

Yes _____ No _____

The foreperson should sign and date this verdict form.

Foreperson

Date

ATTACHMENT I-2

(Defendants' Proposed Special Verdict Form)

JURY VERDICT - SPECIAL INTERROGATORIES AND FINDINGS

Plaintiff's Claims of Defamation (Counts I - III)

We, the jurors, unanimously answer as follows:

1. Plaintiff has proven, by a preponderance of the evidence, that one or more of the statements at issue are substantially false.

YES: _____ NO: _____

If you answer yes, then go to the next question. If you answer no, then your investigation of the Defamation claims ends and you can proceed to question 3.

2. Plaintiff has proven, by clear and convincing evidence, that the substantially false statements were published with actual malice that is, actual knowledge that the statements are false or reckless disregard as to their truth or falsity.

YES: _____ NO: _____

If you answer yes, then make your findings below. If you answer no, then your investigation of the Defamation claims ends and you can proceed to question 3.

We, the jury, unanimously, make the following findings regarding liability for Plaintiff's Defamation claims (Please answer for each Defendant):

As to Defendant Latasha Kebe:

YES: _____ NO: _____
(liable) (not liable)

As to Defendant Kebe Studios LLC:

YES: _____ NO: _____
(liable) (not liable)

Please proceed to question 3.

Plaintiff's Claim of Invasion of Privacy False Light (Count IV)

We, the jurors, unanimously answer as follows:

3. Plaintiff has proven, by a preponderance of the evidence, that one or more of the published statements at issue are nondefamatory.

YES: _____ NO: _____

If you answer yes, then go to the next question. If you answer no, then your investigation of the Invasion of Privacy claim ends and you can proceed to the instructions at the bottom of this page.

4. Plaintiff has proven, by a preponderance of the evidence, that the publicity depicted Plaintiff in a false light, which would be highly offensive to a reasonable person.

YES: _____ NO: _____

If you answer yes, then make your findings below. If you answer no, then your investigation of the Invasion of Privacy claim ends and you can proceed to the instructions at the bottom of this page.

We, the jury, unanimously, make the following findings regarding liability for Plaintiff's Invasion of Privacy False Light claim (Please answer for each Defendant):

As to Defendant Latasha Kebe:

YES: _____ NO: _____
(liable) (not liable)

As to Defendant Kebe Studios LLC:

YES: _____ NO: _____
(liable) (not liable)

Only if you found Defendant Latasha Kebe, Defendant Kebe Studios LLC, or both, liable to Plaintiff for her Defamation and/or Invasion of Privacy claims, then you can proceed to question 5. If you found that neither Defendant is liable to Plaintiff for her Defamation and/or Invasion of Privacy claims, then your investigation ends.

Plaintiff's Claim of Intentional Infliction of Emotional Distress (Count V)

We, the jurors, unanimously answer as follows:

5. Plaintiff has proven, by a preponderance of the evidence, that the conduct at issue was directed at the Plaintiff and not at the public in general.

YES: _____ NO: _____

If you answer yes, then go to the next question. If you answer no, then your investigation of the Intentional Infliction of Emotional Distress claim ends and you can proceed to the instructions at the bottom of page 4.

6. Plaintiff has proven, by a preponderance of the evidence, that the conduct at issue was intentional or reckless.

YES: _____ NO: _____

If you answer yes, then go to the next question. If you answer no, then your investigation of the Intentional Infliction of Emotional Distress claim ends and you can proceed to the instructions at the bottom of page 4.

7. Plaintiff has proven, by a preponderance of the evidence, that the conduct at issue was so outrageous in character and so extreme in degree, as to go beyond all possible bounds of decency, and be regarded as atrocious and utterly intolerable in a civilized community.

YES: _____ NO: _____

If you answer yes, then go to the next question. If you answer no, then your investigation of the Intentional Infliction of Emotional Distress claim ends and you can proceed to the instructions at the bottom of page 4.

8. Plaintiff has proven, by a preponderance of the evidence, that she has suffered emotional distress so severe that no reasonable person could be expected to endure it.

YES: _____ NO: _____

If you answer yes, then go to the next question. If you answer no, then your investigation of the Intentional Infliction of Emotional Distress claim ends and you can proceed to the instructions at the bottom of page 4.

9. Plaintiff has proven, by a preponderance of the evidence, that the outrageous and extreme conduct at issue was the cause of her severe emotional distress.

YES: _____ NO: _____

If you answer yes, then make your findings below. If you answer no, then your investigation of the Intentional Infliction of Emotional Distress claim ends and you can proceed to the instructions at the bottom of this page.

We, the jury, unanimously, make the following findings regarding liability for Plaintiff's Intentional Infliction of Emotional Distress claim (Please answer for each Defendant):

As to Defendant Latasha Kebe:

YES: _____ NO: _____
(liable) (not liable)

As to Defendant Kebe Studios LLC:

YES: _____ NO: _____
(liable) (not liable)

Only if you found Defendant Latasha Kebe, Defendant Kebe Studios LLC, or both, liable to Plaintiff for one or more of her claims, then you can proceed to question 10. If you found that neither Defendant is liable to Plaintiff for any of her claims, then your investigation ends.

Damages

We, the jury, unanimously, make the following findings regarding damages:

10. Plaintiff has proven, by a preponderance of the evidence, that she is entitled to recover actual monetary damages.

YES: _____ NO: _____

If you answer yes, please specify the amount of Plaintiff's actual monetary damages:

\$_____.

11. Plaintiff has proven, by a preponderance of the evidence, that she is entitled to recover general damages for pain and suffering.

YES: _____ NO: _____

If you answer yes, please specify the amount of Plaintiff's general damages:

\$_____.

12. Plaintiff has proven that Defendant Latasha Kebe and Defendant Kebe Studios LLC are jointly and severally liable for the damages awarded to her, if any.

YES: _____ NO: _____

If you answer no, please assign the percentage of fault, if any, you attribute to each Defendant for causing Plaintiff's damages. (The total must equal to 100%).

Defendant Latasha Kebe: _____%

Defendant Kebe Studios LLC: _____%

Please proceed to question 13.

Litigation Expenses and Punitive Damages

We, the jurors, unanimously answer as follows:

13. Do you find that Defendant Latasha Kebe, Defendant Kebe Studios LLC, both, or neither, have acted in bad faith, have been stubbornly litigious, or have caused Plaintiff unnecessary trouble and expense? (Please answer for each Defendant).

As to Defendant Latasha Kebe:

YES: _____ NO: _____

As to Defendant Kebe Studios LLC:

YES: _____ NO: _____

14. Do you find that Plaintiff has proven, by clear and convincing evidence, that the actions of Defendant Latasha Kebe, Defendant Kebe Studios LLC, both, or neither, showed willful misconduct, malice, fraud, wantonness, oppression, or that entire want of care which would raise the presumption of conscious indifference to consequence? (Please answer for each Defendant).

As to Defendant Latasha Kebe:

YES: _____ NO: _____

As to Defendant Kebe Studios LLC:

YES: _____ NO: _____

15. Do you find that Plaintiff has proven, by clear and convincing evidence, that Defendant Latasha Kebe, Defendant Kebe Studios LLC, both, or neither, acted with the specific intent to cause harm to Plaintiff? (Please answer for each Defendant).

As to Defendant Latasha Kebe:

YES: _____ NO: _____

As to Defendant Kebe Studios LLC:

YES: _____ NO: _____

This _____ day of _____, 20____.

Foreperson